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## **U.S.** Department of Justice

United States Attorney Eastern District of New York

SPN/MKM/KDE F.#2015R00747 271 Cadman Plaza East Brooklyn, New York 11201

April 20, 2020

## By ECF and Hand

The Honorable Pamela K. Chen United States District Judge United States District Court Eastern District of New York 225 Cadman Plaza East Brooklyn, New York 11201

Re: United States v. José Margulies

Criminal Docket No. 15-252 (PKC)

## Dear Judge Chen:

At the defendant José Margulies's sentencing on January 21, 2020, the government, with the consent of the defendant as well as FIFA, CONMEBOL and CONCACAF (the "Victims"), requested that the Court stay any determination of possible restitution owed by the defendant given other possible means by which the Victims might be compensated for their losses. The Court granted that request and directed the government to provide an update by April 20, 2020.

Accordingly, the government writes to notify the Court that the government and the Victims continue to pursue possible alternative avenues for them to be compensated for their losses. Therefore, the government, with the consent of the defendant and the Victims, requests that the Court continue to stay any restitution determination as to the defendant for an additional 90 days, by which time the government will provide another update to the Court. See generally United States v. Gushlak, 728 F.3d 184, 191-92 (2d Cir. 2013) (a district court may order restitution beyond the 90-day period set forth in 18 U.S.C. § 3664(d)(5)). The government respectfully submits that this request is consistent with the Court's order staying the restitution payments previously ordered as to other defendants and the Second Circuit's order staying the appeals of restitution orders as to the defendants Eduardo Li and Brayan Jiménez.

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Therefore, the government respectfully requests that the Court stay any restitution determination as to the defendant until July 20, 2020.

Respectfully submitted,

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By: /s/

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ce: Clerk of Court (PKC) (by ECF)
Defense Counsel (by ECF)